



From the desk of:
James M. Kramer, Esq.

January 26, 2022


VIA CM/ECF

Hon. Debra C. Freeman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Gref v. Am. Int'l Indus., et al.*, 20-cv-05589

The proposed modification of the
discovery schedule is approved.

SO ORDERED


DEBRA FREEMAN
United States Magistrate Judge
Dated: 1/27/2022

Dear Judge Freeman,

The parties have conferred and are in agreement that the following discovery deadlines be amended as follows:

- (i) Plaintiff's non-medical expert reports are to be provided by March 31, 2022;
- (ii) Defendants' medical and non-medical expert reports are to be provided by April 29, 2022;
- (iii) Rebuttal reports are to be provided by May 31, 2022;
- (iv) Expert depositions are to be completed by July 15, 2022; and
- (v) All discovery is to be completed by July 29, 2022.

If this joint request meets with Your Honor's approval, the parties respectfully request that the Court so-order the Scheduling Order amended as set forth above.

As always, we are available at the Court's convenience if you have any questions or would like additional information.

Respectfully,



cc: All Counsel of Record via CM/ECF

We stand for our clients.

HEADQUARTERS

One Court Street
Alton, IL 62002
TEL: (618) 259-2222
FAX: (618) 259-2251

NEW YORK

112 Madison Avenue
New York, NY 10016
TEL: (212) 784-6400
FAX: (212) 213-5949

CHICAGO

230 W. Monroe
Suite 2221
Chicago, IL 60606
TEL: (312) 759-7500
FAX: (312) 759-7516

SAN FRANCISCO

455 Market
Suite 1150
San Francisco, CA 94105
TEL: (415) 536-3986
FAX: (415) 537-4120

LOS ANGELES

100 N. Sepulveda Blvd.
Suite 1350
El Segundo, CA 90245
TEL: (310) 322-3555
FAX: (310) 322-3655

ST. LOUIS

231 S. Bemiston
Suite 525
St. Louis, MO 63105
TEL: (800) 479-9533